

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

Selena S. Randolph,  
Plaintiff

v.

WBL SPE II, LLC, as successor to  
World Business Lenders, LLC,  
Defendant

PLAINTIFF'S REPLY TO DEFENDANT'S  
RENEWED MOTION FOR CONTEMPT

Civil No. 1:18-cv-00730-JL

**Exhibit A – Affidavit of Selena Randolph  
May 10, 2019**



**University of  
New Hampshire**

UNH School of Law  
Civil Law Clinic

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Concord, NH 03301 USA

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May 21, 2019

Susan A. Lowry, Esquire  
Upton & Hatfield, LLP  
P. O. Box 1090  
Concord, NH 03302-1090

**Re: Selena Randolph v. WBL SPE II, LLC**

Dear Susan:

Enclosed please find the original Affidavit of Selena Randolph explaining the loss of business records which include the leases and payment history for tenants which you had requested in discovery. Ms. Randolph explains that these documents were spoiled following a flooding of the building where she maintained these records. For this reason she is unable to produce copies and apparently does not have electronic backup either.

I suggest we discuss this further before we file anything with the court, if such a filing is necessary. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Peter S. Wright, Jr.'.

Peter S. Wright, Jr., Esquire  
Director of Clinical Programs

Enclosure

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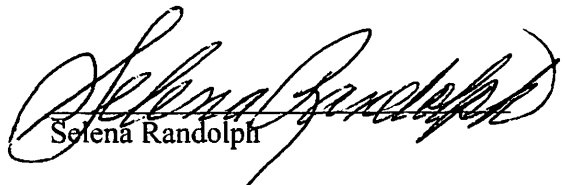
WBL SPE II, LLC,

Defendant  
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**AFFIDAVIT OF SELENA RANDOLPH**

1. My name is Selena Randolph, plaintiff in this matter; and I make the following statements based upon my personal knowledge about which I could testify in court.
2. I received discovery requests from World Business Lenders SPE II, LLC. These requests included copies of all bank statements into which funds from the WBL loan were deposited and from which payments were made. I have provided those bank statements already.
3. The other part of the request for production of documents was a list of tenants, the terms of occupancy, and the dates of each tenancy, along with copies of all leases for all properties owned by me.
4. I no longer have records of the tenants, tenancies, periods of occupancy, or copies of their leases as those records were badly water-damaged after a pipe burst in the building where I kept my business records.
5. When Serv-Pro came to clean up after the flooding, these records were destroyed.
6. Thus, I am unable to provide copies of the leases or business records pertaining to those tenancies as requested.

25-10-19  
Date

  
Selena Randolph

State of New Hampshire

County of Rockingham

Signed and sworn to before me on this 10th day of May, 2019 by  
Selena Randolph.

Nathan A. Pepin  
Notary Public/Justice of the Peace

NATHAN A. PEPIN, Notary Public  
State of New Hampshire  
My Commission Expires October 3, 2023

